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John Doe (IP address 50.166.10.240)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MALIBU MEDIA, LLC,

Plaintiffs

Civil Action No. 2:15-cv-01742-MCA-JBC

VS.

JOHN DOE subscriber assigned IP
address 50.166.10.240

Defendants

NOTICE OF MOTION TO QUASH

Notice is given that on June 15, 2015, or as soon thereafter as the Honorable Court will allow, Defendant, John Doe (identified as allegedly having IP address 50.166.10.240), by and through counsel Ernest D. Buff, Esq. of Ernest D. Buff & Associates, LLC, will respectfully move the Honorable Madeline C. Arleo, U.S.D.J., at the United States District Court in Newark, New Jersey for an Order to Quash the Third Party Subpoena issued to Defendant's Internet service provider, Comcast Cable Holdings, LLC (Comcast), seeking confidential and proprietary identity information.

This motion will be made on the grounds that the Order is necessary, because:

- (i) the Third Party Subpoena seeks to obtain protected information, which would subject John Doe to an undue burden in the form of undeserved reputational injury, embarrassment

and harassment; and (ii) the subpoena seeks information that is not relevant, given Plaintiff's failure to link John Doe to alleged copyright infringement activity.

The grounds for this motion are more fully set forth in the accompanying "Brief in Support of Motion to Quash by Defendant John Doe" and "Certification of Ernest D. Buff, Esq."



Counsel for Defendant, John Doe
Ernest D. Buff, Esq.
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DATED: May 20, 2015